

Ms. Ann York
York Casket Company-Indiana
2125 E. County Road 1050 South
Lynn, IN 47355

Re: Re: 135-15042
First Significant Permit Modification to
Part 70 135-7198-00009

Dear Ms. York:

York Casket Company - Indiana, was issued a Title V permit on December 16, 1998, for the operation of a stationary burial casket manufacturing plant. A letter requesting changes in some permit conditions was received on November 8, 2001. This modification relates to the removal of limitations on stripper usage at the Main Plant, and the addition of stripper usage limitations to the Specialty Plant. The modification stated above involves significant changes to emission limitations. Pursuant to the provisions of 326 IAC 2-7-12(d)(1), a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

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cc: File - Randolph County
U.S. EPA, Region V
Randolph County Health Department
Air Compliance Section Inspector - Dave Rice
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**York Casket Company - Indiana
US 27 and County Road 1050 South
Lynn, Indiana 47355**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 135-7198-00009	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: 12-16-1998

1st Administrative Amendment No.: 135-14728

Issued on: 8-21-2001

1 st Significant Permit Modification No.: 135-15042	Pages Modified: 3, 29, 30, 31, 32, 38a
Issued by: Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date:

- C.7 Operation of Equipment [326 IAC 2-7-6(6)]
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

Testing Requirements [326 IAC 2-7-6(1)]

- C.9 Performance Testing [326 IAC 3-6]

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- C.10 Compliance Schedule [326 IAC 2-7-6(3)]
- C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.12 Monitoring Methods [326 IAC 3]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
[326 IAC 2-7-6] [326 IAC 1-6]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)]
[326 IAC 2-6]
- C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]
- C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

Stratospheric Ozone Protection

- C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS - Main Plant

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.1.4 Particulate Matter (PM)
- D.1.5 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.1.6 Record Keeping Requirements

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - Main Plant

- (a) One (1) primer paint spray booth and one (1) bottom primer spray booth, known as P-2A and P-2H, each equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stacks EP-2A and EP-2H, capacity: 27 burial caskets per hour, total.
- (b) Two (2) color coat spray booths (#1 and #2) known as P-3A and P-3B, each equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stacks EP-3A and EP-3B, capacity 27 burial caskets per hour, total.
- (c) One (1) paint stripper dipping operation, known as P-3C, exhausting through stack EP-3C, capacity: 27 burial caskets per hour.
- (d) Two (2) topcoat spray booths (#1 and #2), known as P-4A and P-4B, equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stack EP-4A and EP-4B, capacity: 27 burial caskets per hour, total.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from spraying operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.4 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when spray coating is in operation.

D.1.5 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading

shall be made of the overspray from the spray booth stacks EP-2A, EP-2H, EP-3A, EP-3B, EP-4A and EP-4B while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.6 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.5, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Specialty Plant

- (e) One (1) paint spray booth, known as Speciality Plant, equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stack 1, capacity: 4 burial caskets per hour.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compound

- (a) Pursuant to Operation Permit-68-01-94-0132, issued on March 12, 1990, the Specialty Plant shall use no more than 2.08 tons of VOC, including coatings, dilution solvents, and cleaning solvents per month. This usage limit makes 326 IAC 8-1-6 not applicable.
- (b) Pursuant to CP 135-4643, issued on July 27, 1995, the amount of stripper used in the stripping operation at the Specialty Plant shall be limited to 3,600 gallons per 12 consecutive month period.

D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from coating operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.2.1 or the particulate matter limit specific in Condition D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.4 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.5 VOC Emissions

Compliance with Condition D.2.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.6 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when spray coating is in operation.

D.2.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from paint spray booth Stack 1. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.2.1.
 - (1) The amount as well as the VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The amount of stripper used in the stripping operation. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the stripper usage limits established in Condition D.2.1(b).
 - (3) A log of the dates of use;
 - (4) The volume weighted VOC content of the coatings used for each month;
 - (5) The cleanup solvent usage for each month;
 - (6) The total VOC usage for each month; and
 - (7) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.2.2 and D.2.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: York Casket Company - Indiana
Source Address: US 27 and County Road 1050 South, Lynn, Indiana 47355
Mailing Address: 2125 E. County Road 1050 South, Lynn, Indiana 47355
Part 70 Permit No.: T 135-7198-00009
Facility: Stripping Operation
Parameter: Stripper
Limit: 3,600 gallons per 12 consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	York Casket Company-Indiana
Source Location:	US 27 and County Road 1050 South, Lynn, Indiana
County:	Randolph
SIC Code:	3995
Operation Permit No.:	135-7198-00009
Operation Permit Issuance Date:	12-16-1998
Permit Modification No.:	135-15042
Permit Reviewer:	Madhurima D. Moulik

The Office of Air Quality (OAQ) has reviewed a modification application from York Casket Company-Indiana relating to the operation of a stationary burial casket manufacturing plant.

Explanation of Modification

The Part 70 permit erroneously included a condition limiting the amount of stripper used in stripping operations at the Main Plant, whereas the limitation was originally intended for the Specialty Plant. Therefore, the following changes are included in this permit modification:

- (a) The removal of the condition limiting the amount of stripper used in the Main Plant.
- (b) The addition of a condition limiting the stripper usage in the Specialty Plant.

Justification for the Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Permit Modification. According to 326 IAC 2-7-12(b)(1)(C)(i), a minor permit modification cannot be used for a change in "a case-by-case determination of an emission limit or other standard". Since the modification involves a change in the maximum stripper usage, a minor permit modification cannot be used. Therefore, pursuant to 326 IAC 2-7-12(d)(1), a significant permit modification is used.

Existing Approvals

The source was issued a Part 70 Operating Permit No. T 135-7198-00009 on December 16, 1998.

The source has also operated under the following approvals:

- (a) OP 68-03-89-0115, issued on September 5, 1985.
- (b) PC (68) 1796, issued September 30, 1989.

- (c) OP 68-01-94-0132, issued on March 27, 1990.
- (d) CP 135-4643-00009, issued on July 27, 1995.
- (e) EQ 135-5901-00009, issued June 18, 1996.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on November 8, 2001.

Proposed Changes to the Part 70 Operating Permit

The following changes are the Significant Permit Modification for this source (~~strikeout~~ added to show the deletions and **bold** to show the additions):

- (1) The Condition D.1.1 is deleted, and the remaining subsections are renumbered:

Emission Limitations and Standards [326 IAC 2-7-5(1)]

~~D.1.1 Volatile Organic Compound~~

~~The amount of stripper used in the stripping operation shall be limited to 3,600 gallons per year.~~

D.1.21 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (2) The condition in D.1.3 is modified as follows:

Compliance Determination Requirements

D.1.4 3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.1.2 1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

~~D.1.4 Volatile Organic Compounds (VOC)~~

~~Compliance with the VOC usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

(3) The record keeping requirements in D.1.6 is modified as follows:

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 **6** Record Keeping Requirements

- a) ~~To document compliance with Condition D.1.1, the Permittee shall maintain records of the amount of stripper used in the stripping operation. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the stripper usage limits established in Condition D.1.1.~~
- (a b) To document compliance with Conditions D.1.2 **1** and D.1.7 **5**, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

(4) A condition is added to Section D.2.1 related to the limitation on stripper usage as follows:

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compound

- (a) Pursuant to Operation Permit-68-01-94-0132, issued on March 12, 1990, the Specialty Plant shall use no more than 2.08 tons of VOC, including coatings, dilution solvents, and cleaning solvents per month. This usage limit makes 326 IAC 8-1-6 not applicable.
- (b) **Pursuant to CP 135-4643, issued on July 27, 1995, the amount of stripper used in the stripping operation at the Specialty Plant shall be limited to 3,600 gallons per 12 consecutive month period.**

(5) The record keeping requirements is modified as follows:

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.2.1.
 - (1) The amount as well as the VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) **The amount of stripper used in the stripping operation. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the stripper usage limits established in Condition D.2.1(b).**
 - (2 3) A log of the dates of use;
 - (3 4) The volume weighted VOC content of the coatings used for each month;

- (4 5) The cleanup solvent usage for each month;
 - (5 6) The total VOC usage for each month; and
 - (6 7) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.2.2 and D.2.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
- (6) The subsections of D.1 are renumbered in the Table of Contents.

D.1 FACILITY OPERATION CONDITIONS - Main Plant

Emission Limitations and Standards [326 IAC 2-7-5(1)]

~~D.1.1 Volatile Organic Compounds (VOC)~~

D.1.2 1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

D.1.3 2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.1.4 3 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~D.1.4 Volatile Organic Compounds (VOC)~~

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 4 Particulate Matter (PM)

D.1.7 5 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 6 Record Keeping Requirements

- (7) References to the Office of Air Management (OAM) are changed to Office of Air Quality (OAQ).
- (8) A report form has been added for Condition D.2.1(b).

Conclusion

This permit modification shall be subject to the conditions of the attached Part 70 Significant Permit Modification No. 135-15042.